

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for a Notice of Inquiry Regarding)	PS Docket No. 08-51
911 Call-Forwarding Requirements and)	
Carriers' Blocking Options for Non-)	
Initialized Phones)	

COMMENTS OF THE CITY OF LAREDO, TEXAS

The City of Laredo, Texas ("Laredo") submits these initial comments to the Federal Communications Commission ("Commission" or "FCC") Notice of Inquiry in the above-referenced dockets, which seeks comment, analysis, and information on three specific areas: (1) the nature and extent of fraudulent 9-1-1 calls made from Non-Service Initialized ("NSI") devices; (2) concerns with blocking NSI phones used to make fraudulent 9-1-1 calls, and suggestions for making this a more viable option for carriers; and (3) other possible solutions to the problem of fraudulent 9-1-1 calls from NSI handsets. Laredo's comments are specific to the nature and extent of fraudulent 9-1-1 calls from NSI devices.

I. INTRODUCTION

Laredo is located on the north bank of the Rio Grande River and is the only city in the United States to operate international bridges between two Mexican states. Laredo presently maintains three border crossings with the Mexican State of Tamaulipas at Nuevo Laredo, and one with the Mexican State of Nuevo León at Colombia. Laredo is the principal port of entry from the United States into Mexico and is situated along the Pan American Highway that stretches from Canada into Central and South America. More than 47% of United States international trade headed for Mexico and more than 36% of Mexican international trade crosses through the Laredo port of entry. Two bridges are dedicated to non-commercial traffic only,

open 24x7 with greater than 350,000 pedestrian crossings each month. One bridge is dedicated to commercial traffic only and the fourth bridge is open to both commercial and non-commercial traffic. The bridges open to commercial traffic operate from 8 a.m. to 12 a.m. Monday through Friday with limited hours on weekends. The volume of vehicular traffic for all bridges is greater than 560,000 crossings each month, of which approximately 127,000 are attributed to commercial traffic.

Laredo has a total area of 84.54 square miles. According to the 2006 census estimate, the city's population was 217,559. The Texas Water Development Board forecasts that Laredo's population will increase to 247,380 by the year 2010. Laredo is served by one Public Safety Answering Point ("PSAP")—the Laredo Police Department. The Laredo PSAP has fully implemented Wireless Phase I and has deployed Wireless Phase II with one carrier. To date, Laredo has not requested that wireless service providers block the delivery to the PSAP of any 9-1-1 calls from NSI devices.

II. EXTENT OF FRAUDULENT 9-1-1 CALLS MADE FROM NSI DEVICES

The data provided by the Laredo Police Department for analysis was retrieved from Laredo's PSAP Management Information System, reporting on 9-1-1 call information including time of call, location information, and if the call was sent to the PSAP's Computer Aided Dispatch system for dispatch. A summary of the data analysis is attached as Exhibit "A".

From February 2008 through April 2008 the PSAP received a total of 44,492 9-1-1 calls, of which 68.35% (30,409) were wireless calls. Of the wireless calls, 32.51% (9,886) were from NSI devices. During the three month period of review, the PSAP had a daily average of 103, 112 and 112 9-1-1 calls from NSI devices, respectively, with a high daily volume of 199 and a low of 49. Response was dispatched in response to 57 of these calls, 22 of which were on account of bomb threats to the international bridges. Removing the instances of bomb threats, and the number of NSI 9-1-1 calls

warranting dispatch is reduced to 35, or less than one-half of one-percent of the total number of 9-1-1 calls from NSI devices.

By comparison, emergency response was dispatched on 974 (4.75%) 9-1-1 calls from service initialized wireless devices and 5,912 (41.98%) from non-wireless devices. Low dispatch rate to calls from service initialize wireless devices is generally attributed to multiple wireless calls reporting on the same accident, non emergency calls, hang ups and prank calls. The above analysis is summarized in Exhibit "A" Table No. 1.

From a national security perspective, most disturbing about the misuse of NSI devices is the fact that during the review period all bomb threats received via 9-1-1 originated from such devices. When such a threat is made and cannot be identified with absolute certainty as a hoax, response agencies are deployed to the target bridge. If the bridge is not identified, response agencies are deployed to all of the international bridges. The response agencies include: Laredo Fire Department, Laredo Police Department, U.S. Border Patrol, and Mexican law enforcement response agencies on the Mexican side of the bridges. The bridges are closed to all traffic until the threat is assessed as a hoax, usually between 30 – 60 minutes. In addition to adversely impacting the response agencies, the closure of the international bridges has a direct, negative impact on commercial trade, recreational travelers and people traveling for employment purposes.

During the review period, more than 100 NSI devices made monthly repeat calls to 9-1-1. The majority of the devices (75+) make between 5 to 10 repeat calls per month, with about 10 devices making more than 25 repeat calls per month. The same NSI device, however, is rarely used to make repeat calls for all 3 months. This suggests that the blocking of single NSI devices is an ineffective solution to preventing repeat calls from NSI devices. Exhibit "A" Table No. 2 summarizes the five NSI devices with the highest volume of repeat calls during the review period.

III. CONCLUSION

The City of Laredo, Texas appreciates the opportunity to provide analysis and comment on the extent of fraudulent 9-1-1 calls made from NSI devices. Respectfully submitted on this the 27th day of June, 2008.

CITY OF LAREDO, TEXAS

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EXHIBIT A – Laredo 9-1-1 Call Data**Table No. 1**

	Feb-08	Mar-08	Apr-08	3 Month Total
Total number of Calls	13,630	15,895	14,967	44,492
Total # of Wireless Calls	9,257	10,862	10,290	30,409
% Wireless calls of Total calls	67.92%	68.34%	68.75%	68.35%
Total # of calls from NSI Devices	2,973	3,477	3,436	9,886
% NSI calls of Total Calls	21.81%	21.87%	22.96%	22.22%
% NSI calls of Wireless Calls	32.12%	32.01%	33.39%	32.51%
Total # of non wireless calls responded to	1905	2074	1933	5,912
% response to non wireless calls	43.56%	41.21%	41.33%	41.98%
Total # of calls from SI Devices responded to	166	374	434	974
% response to SI calls	2.64%	5.06%	6.33%	4.75%
Total # of calls from NSI Devices responded to	13	15	29	57
% response to NSI calls	0.44%	0.43%	0.84%	0.58%
Total # of calls from NSI Devices for bomb threats*	9	8	5	22
% response to NSI calls – bomb threats	0.13%	0.20%	0.70%	0.35%
Average # of calls from NSI Devices per day for the month	103	112	112	
# of calls from NSI Devices on day with the lowest count	66	49	63	
# of calls from NSI Devices on day with the highest count	154	167	199	
# of NSI devices that made 5 - 10 calls for the month	78	85	88	
# of NSI devices that made 11 - 24 calls for the month	27	39	29	
# of NSI devices that made 25 or more calls for the month	9	8	12	

* Data not provided from PSAP's Management Information System

EXHIBIT A – Laredo 9-1-1 Call Data**Table No. 2**

NSI Device	Wireless Carrier	Feb calls	Mar calls	Apr calls	Details
(911) 289- 5160	AT&T Mobility	0	1	100	<u>4/24</u> 55 calls between 13:34 & 23:21 18 tower & sector combinations. <u>4/26</u> 31 calls between 14:04 & 23:01 29 tower & sector combinations.
(911) 030- 5660	AT&T Mobility	0	0	82	82 calls spread over a 9 day period during April.
(911) 531- 0480	Nextel Partners	0	0	79	<u>4/4</u> 52 calls between 14:31 & 16:56 34 tower & sector combinations.
(911) 356- 1480	Nextel Partners	0	81	0	<u>3/22</u> 34 calls between 12:41 & 14:14 4 tower & sector combinations.
(911) 289- 5500	AT&T Mobility	87	0	0	<u>2/10</u> 21 calls between 09:50 & 10:01 16 tower & sector combinations. <u>2/12</u> 33 calls between 08:29 & 18:26 25 tower & sector combinations. <u>2/13</u> 28 calls between 08:53 & 09:38 20 tower & sector combinations.